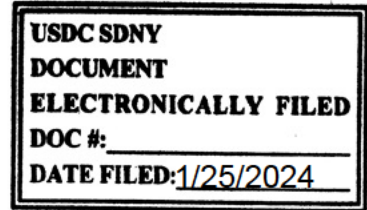


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January 24, 2024

VIA CM/ECF

Hon. Robert W. Lehrburger
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, New York 10007

Granted.

SO ORDERED:

1/25/2024

A handwritten signature in black ink, appearing to be "R. Lehrburger".

HON. ROBERT W. LEHRBURGER
UNITED STATES MAGISTRATE JUDGE

Re: *Lupin Ltd. v. Salix Pharmaceuticals, Inc., et al.*, No. 22-cv-7656 (JHR)

Dear Judge Lehrburger:

We represent Plaintiff and Counterclaim-Defendant Lupin Ltd. (“Lupin” or “Plaintiff”) in this action. Pursuant to the Court’s order dated January 19, 2024 (ECF No. 93), the Court granted Lupin’s motions seeking issuance of letters of request for discovery from foreign entities Fabbrica Italiana Sintetici S.p.A. in Italy and Rohner AG in Switzerland under the Hague Convention, subject to certain revisions to the language used. The Court also granted a similar request filed by Defendant and Counterclaim-Plaintiff Salix Pharmaceuticals, Inc. (“Salix”) and Defendant Bausch Health US, LLC (“Bausch US,” and together with Salix, “Defendants”). The Court directed the Defendants to notify the Court by January 24, 2024, if they sought to modify their letters of request based on agreement with Lupin concerning the use of neutral language.

Defendants wrote to Plaintiff seeking proposed neutral language on January 23, 2024, to which Plaintiff responded the same day noting that it was still reviewing and was working on a response. Today, Defendants filed a letter to the Court seeking the grant of their letters of request without revision to the language. ECF No. 94.

Plaintiff respectfully requests that the Court grant Plaintiff a one-week extension, until January 31, 2024, to submit revised requests with jointly agreed upon language, so that we have sufficient time to confer with our client and attempt to resolve any disputes with Defendants. Defendants have consented to Lupin’s request. Lupin will notify the Court no later than January 31, 2024, if the parties have reached an agreement concerning the language or if they are at an impasse.

KIRKLAND & ELLIS LLP

Hon. Robert W. Lehrburger
January 24, 2024
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Respectfully submitted,

/s/ Kyla Jackson
Kyla Jackson

Cc: All counsel of record via ECF